

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	Case No. 4:15CR00230 JAR (JMB)
Plaintiff,	)	
	)	Date: To Be Set
v.	)	Time: To Be Set
	)	Courtroom: To Be Set
JACOBI R. TEMPLE,	)	
	)	Attached Documents:
Defendant.	)	1. Defendant's Reply In Support of
	)	Motion for Pretrial Discovery

**DEFENDANT'S MOTION FOR LEAVE TO FILE**  
**REPLY IN SUPPORT OF MOTION FOR PRETRIAL DISCOVERY AND**  
**PREAUTHORIZATION DISCOVERY OUT OF TIME**

COMES NOW defendant, by and through undersigned counsel, and for his Motion for Leave to File Reply in Support of Motion for Pretrial Discovery and Preauthorization Discovery Out of Time, states as follows:

1. Defense counsel did not receive the government's response dated December 28, 2015, or the Court's Order dated December 14, 2015, until January 5, 2015.
2. On January 5, 2015, defense counsel was advised by the court that notifications on the CM/ECF system were turned off for defense counsel's account.
3. The court has advised defense counsel that notifications have now been turned back on for defense counsel's account.
4. Defense counsel has acted promptly in the filing of this motion and the proposed Reply In Support of Motion for Pretrial Discovery is attached hereto as Exhibit "1".

WHEREFORE, defendant prays this Court grant defendant leave to file his Reply in Support of Motion for Pretrial Discovery and Preauthorization Discovery out of time, and for such other and further orders as this Court deems just and proper under the circumstances.

Respectfully submitted,

/s/ Joseph L. Green

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### **CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Thomas Rea  
Assistant United States Attorney  
111 South 10<sup>th</sup> Street, 20<sup>th</sup> Floor  
St. Louis, MO 63102

Joseph L. Green

Joseph L. Green

### **DECLARATION OF COUNSEL**

I declare that the factual averments in the foregoing motion and the attached memorandum of points and authorities are true and correct and based on my personal knowledge. Subscribed to by me this 10<sup>th</sup> day of December, 2015.

/s/ Joseph L. Green

JOSEPH L. GREEN